

JOSEPH P. RUSSONIELLO (CSBN 44332)  
United States Attorney

BRIAN STRETCH (CSBN 163973)  
Chief, Criminal Division

DENISE MARIE BARTON (MABN 634052)  
Assistant United States Attorney

450 Golden Gate Avenue, Box 36055  
San Francisco, California 94102  
Telephone: (415) 436-7359  
Facsimile: (415) 436-7234  
denise.barton@usdoj.gov

Attorneys for Plaintiff

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA,	)	CR No. 07-0454 PJH
	)	
Plaintiff,	)	
	)	
v.	)	STIPULATION AND <del>[PROPOSED]</del> ORDER
	)	EXCLUDING TIME UNDER 18 U.S.C. § 3161
	)	
SHANNON BLAYLOCK,	)	
aka ARLANDYS RICHARDSON,	)	
aka "DADDY RICH",	)	
TAWAKONI SEATON,	)	
aka TONI, and	)	
LATOSHA GARDNER,	)	
	)	
Defendant.	)	

On March 26, 2008, the parties in this case appeared before the Court and stipulated that time should be excluded from the Speedy Trial Act calculations for co-defendant Gardner from March 26, 2008 through April 9, 2008 and for co-defendants Blaylock and Seaton from March 26, 2008 through April 30, 2008. The parties represented that granting the continuance was

//

//

1 necessary for effective preparation of counsel, taking into account the exercise of due diligence.

2 See 18 U.S.C. § 3161(h)(8)(B)(iv).

3 SO STIPULATED:

4  
5 JOSEPH P. RUSSONIELLO  
United States Attorney

6  
7 DATED: April 30, 2008

8 /s/ Denise Barton  
DENISE MARIE BARTON  
Assistant United States Attorney

9  
10 DATED: April 30, 2008

11 /s/  
MICHAEL STEPANIAN  
Attorney for SHANNON BLAYLOCK

12  
13 DATED: April 30, 2008

14 /s/  
KENNETH WINE  
Attorney for TAWAKONI SEATON

15  
16 DATED: April 30, 2008

17 /s/  
JODI LINKER  
Attorney for LATOSHA GARDNER

**[Proposed] Order**

As the Court found on March 26, 2008 and for the reasons stated above, the Court finds that the ends of justice served by the continuance outweigh the best interests of the public and the defendants in a speedy trial and that time should be excluded from the Speedy Trial Act calculations time should be excluded from March 26, 2008 through April 9, 2008 for co-defendant Gardner and from March 26, 2008 through April 30, 2008 for co-defendants Blaylock and Seaton for effective preparation of counsel. See 18 U.S.C. §3161 (h)(8)(A). The failure to grant the requested continuance would deny counsel reasonable time necessary for effective preparation of counsel, taking into account the exercise of due diligence, and would result in a miscarriage of justice. See 18 U.S.C. §3161(h)(8)(B)(iv).

SO ORDERED.

DATED: 5/1/08

